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February 9, 2009

VIA ECFS TRANSMISSION

Marlene H. Dortch, Secretary
Federal Communications Commission
445 – 12th Street, S.W.
Suite TW-A325
Washington, D.C. 20554

*Re: Compass Global, Inc.
Annual 47 C.F.R. §64.2009(e) Certification
EB Docket No. 06-36*

Dear Ms. Dortch:

Pursuant to *Public Notice DA09-9* (January 7, 2009), enclosed herewith for filing with the Federal Communications Commission in the above-referenced docket is the Annual §64.2009(e) CPNI Certification and supporting statement of Compass Global, Inc.

To the extent you have any questions concerning this filing, please contact the undersigned.

Respectfully submitted,

Jonathan S. Marashlian
Attorney for Compass Global, Inc.

Enclosures



COMPASS GLOBAL

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Dean H. Cary
President/CEO

Annual CPNI Certification
47 C.F.R. §64.2009(e)
EB Docket No. 06-36

Name of Company: Compass Global, Inc.
Form 499 Filer ID: 826216
Name of Signatory: Dean Cary
Title of Signatory: President

I, Dean Cary, hereby certify that I am an officer of Compass Global, Inc. ("Compass Global") and that I am authorized to make this certification on behalf of Compass Global. I have personal knowledge that Compass Global has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, to the extent that such rules apply to Compass Global or to any of the information obtained by Compass Global. *See* 47 C.F.R. §64.2001 *et seq.* Attached to this certification is an accompanying statement explaining Compass Global's procedures to ensure that it complies with the requirements set forth in §64.2001 *et seq.* of the Commission's rules to the extent that such requirements apply to Compass Global or to the information obtained by Compass Global.

Compass Global has not taken any actions against data brokers before state commissions, state or federal courts, or the FCC in the past year. Compass Global has not received any customer complaints in the past year concerning the unauthorized release of CPNI. Compass Global has no information, other than information that has been publicly reported, regarding the processes that pretexters are using to attempt to access CPNI.

Signed: _____

Dean Cary – President/CEO

Date: January 27, 2009

Compass Global, Inc.
Statement of CPNI Procedures and Compliance

Compass Global, Inc. (“Compass Global”) provides exclusively carrier-to-carrier telecommunications and/or non-telecommunications services. None of its customers are end users of telecommunications services. It has no end user customers. Consequently, Compass Global does not have a “subscriber” relationship with its customers and does not send “bills” to end-user customers. Compass Global does not offer or market its services to the public or to such classes of users as to be effectively available directly to the public. It provides service only to other carriers. Compass Global typically does not obtain the end-user customer’s billing name, address or telephone number, or any other information that relates to the quantity, technical configuration, type, or location of a specific end user customer’s service.

Compass Global does obtain certain call detail information concerning the calls routed through its carrier-to-carrier services. Because Compass Global provides exclusively carrier-to-carrier services, it does not use any call detail information that it obtains in the course of providing those services to attempt to market telecommunications services to the general public or any end-user customers. Moreover, the call detail information obtained by Compass Global is not made available to end-user customers or third parties over the telephone, online, or in retail stores. However, such information may be disclosed: (a) in response to a proper subpoena, court order or other judicial process; or (b) to the transmitting or receiving carriers for billing-relating purposes.

Compass Global safeguards from improper use or disclosure by employees the call detail information that Compass Global obtains in providing its carrier-to-carrier services. Access to call detail information is limited to certain employees, and those employees are trained to protect call detail information from improper use or disclosure and informed that failure to protect that information will result in appropriate disciplinary action. In addition, Compass Global has programs and procedures in place to discover and protect against attempts by third parties to gain unauthorized access to Compass Global computers and call detail records.

Compass Global did not have any breach of its call detail records during 2008. Because Compass Global does not have any presubscribed customers, and does not know the identity of end users whose traffic is routed through Compass Global, it cannot notify those end user customers directly if a breach occurs. However, Compass Global has processes and procedures in place to maintain records of any security breaches and to notify affected carriers and law enforcement of such breaches.